

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE: LETICIA RESENDIZ	:	CHAPTER 13
Debtor	:	
	:	
LETICIA RESENDIZ	:	
Movant	:	
	:	
vs.	:	
	:	
JACK N. ZAHAROPOULOS,	:	
STANDING CHAPTER 13 TRUSTEE	:	
Respondents	:	CASE NO. 1:22-bk-00312-HWV

TRUSTEE'S OBJECTION TO DEBTOR'S
MOTION TO SELL PROPERTY OF THE ESTATE

AND NOW, this 21st day of October, 2022, comes Jack N. Zaharopoulos, Standing Chapter 13 Trustee for the Middle District of Pennsylvania, by and through his attorney, Douglas R. Roeder, and responds to Debtor's Motion to Sell Property of the Estate as follows:

1. Respondent Jack N. Zaharopoulos is the duly appointed Trustee for this case.
2. Trustee does not object to the sale of Debtor's real estate as set forth in the Motion; Trustee objects, however, to the proposed distribution.
3. Trustee objects to Paragraph 2 of Debtor's Motion because it does not propose to pay any and all liens and mortgages against the real estate in full prior to distributing funds to the Debtor.
4. Trustee further objects to Paragraph 2 of Debtor's Motion because Debtor is not entitled to receive \$44,411.49 in exempt proceeds from the sale where Debtor has only claimed an exemption of \$9,306.50 in real estate under §522(d)(1) and Debtor's maximum available exemption in real estate, should she amend her Schedule C, would be \$27,900.00.

If Debtor intends to be paid any funds directly from the sale, then the amount of her exemption that is to be paid to her directly should be specifically set forth in the Motion.

5. Trustee further objects to Paragraph 2 of Debtor's Motion because it fails to distribute the net proceeds of the sale, up to the amount necessary to pay all remaining allowed unsecured claims to the Trustee.

WHEREFORE, your Trustee respectfully requests your Honorable Court to approve the sale as requested in debtor's motion and order that payment of the proceeds of the sale be made in accordance with the Objection set forth above.

Respectfully submitted,

Jack N. Zaharopoulos
Standing Chapter 13 Trustee
8125 Adams Drive, Suite A
Hummelstown, PA 17036
(717)566-6097

BY: /s/Douglas R. Roeder
Attorney for Trustee
droeder@pamd13trustee.com

CERTIFICATE OF SERVICE

AND NOW, this 21st day of October, 2022, I hereby certify that I have served the within Objection electronically notifying parties or by depositing a true and correct copy of the same in the United States mail, first class, postage prepaid and addressed as follows:

Nicholas Platt, Esquire
230 York Street
Hanover, PA 17331

The Money Source, Inc.
3138 E. Elwood Street
Phoenix, AZ 85034

/s/Deborah A. Behney
Office of Jack N. Zaharopoulos
Standing Chapter 13 Trustee